

REMARKS

Applicant is in receipt of the Office Action mailed November 19, 2004. Claims 2 – 4, 7 – 9, 13 – 17, 29 – 32, 34 – 36, 39 – 41, and 43 – 46 were pending. Applicant has cancelled claims 2 – 4, 7 – 9, 13 – 17, 29 – 32, 34 – 36, 39 – 41, and 43 – 46 without prejudice to the subject matter therein, and added new claims 47 – 51. Claims 47 – 51 are therefore pending in the application.

Applicant's newly added claim 47 recites in pertinent part: "**a plurality of keys**, wherein each of the plurality of keys is operable to be depressed, and wherein **each key** comprises a matrix of pins capable of rising above the surface of the key." Claim 47 further recites "a control unit adapted to...detect a selection of a particular key of the plurality of keys; and provide information indicative of an input character corresponding to the particular key to a processor-based system in response to detecting the selection of the particular key."

The Examiner states that Litt discloses a method for displaying a Braille letter in a keyboard key, and that it would have been obvious to modify DeMonte by having the information displayed on each of the plurality of keys to be a Braille letter display, since the incorporation of a Braille letter into keyboard keys would eliminate inefficiencies associated with a separate Braille reading terminal. Applicant respectfully disagrees.

Applicant first notes that the Braille display key of Litt does not display a symbol **corresponding to an input character** of the corresponding key, and further does not result in **information indicative of the input character** to be provided to a processor-based system in response to detecting the selection of the key. Instead, the Braille display key of Litt is used to **sequentially** convey different characters of a set of alphanumeric text stored in a memory (column 6, lines 17-34).

Applicant further respectfully submits that Litt teaches away from the use of a *plurality* of keys to display Braille information at Col. 2, lines 26 – 48. Specifically, Litt teaches that "Because the Braille reading process involves 'looking' at segments of the

line and may involve more than a single reading finger, it has been believed that an effective interface with a computer must therefore use a multicell display which simultaneously displays phrases or segments of the text being read. *If a multicell display must be used, then the separate reading location is unavoidable and the consequent limitations on user efficiency naturally follow.*" (emphasis added) Litt further teaches that "We have discovered that efficient and effective Braille reading does not require a multicell display Comparable reading speeds and comprehension can be achieved with a single cell display which the user can electronically scan over the target text. *As part of our discovery, we have eliminated the inherent inefficiencies associated with a separate Braille reading terminal by integrating the reading function into a key of the standard keyboard.*" (emphasis added)

Accordingly, Applicant respectfully submits that it would not be obvious to modify DeMonte based on the teaching of Litt. Applicant respectfully reminds the Examiner that, in accordance with MPEP 2143.01, "If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious."

For these reasons, claim 47, along with its dependent claims 48 – 51, is believed to patentably distinguish over DeMonte and Litt for the above reasons.

CONCLUSION

In light of the foregoing remarks, Applicant respectfully submits the application is now in condition for allowance, and an early notice to that effect is requested.

No fees are believed necessary; however , the Commissioner is authorized to charge any fees which may be required, or credit any overpayment, to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 50-1505\5681-49800\BNK.

Respectfully submitted,



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